

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES)
)
vs.) No. 05-CR-30020 MAP
)
EDDIE SANTIAGO)

MOTION TO CONTINUE SENTENCING DATE

Now comes the defendant in the above entitled action and moves this Honorable Court for an order to continue the date presently set for Sentencing, January 3, 2007, and asserts as his basis, therefore, the following;

1. In order to permit the psychological evaluation of the defendant, to address those issues raised in paragraphs 86 and 92 of the Presentence Investigation;
2. The revised Pre-Sentence Report shows the defendant was convicted for resisting arrest. This conviction has become a predicate for sentence enhancement an additional period of time is reasonably necessary to permit defense counsel to obtain all of the records underlying this conviction in order to challenge it at the Sentence Hearing.

WHEREFORE, defendant requests this matter be rescheduled to another date convenient to all parties.

Respectfully submitted,
THE DEFENDANT

BY:/s/ Vincent A. Bongiorno
95 State Street - Suite 309
Springfield, MA 01103
(413) 732-0222
BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to the United States District Attorney, Federal Building & Courthouse, 1550 Main Street, Springfield, MA 01103 this 15th day of December 2006.

/s/ Vincent A. Bongiorno